

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
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In the Matter of )  
)  
Petition to Amend Part 68 of the )  
Commission's Rules to Include )  
Terminal Equipment Connected to )  
Basic Rate Access Service Provided )  
via Integrated Services Digital )  
Network Access Technology )

and )

In the Matter of )

Petition to Amend Part 68 of the )  
Commission's Rules to Include )  
Terminal Equipment Connected to )  
Public Switched Digital Service )

and )

Correction of Part 68 Typographical )  
Errors, Clarifications and a Proposal )  
for Part 68 Registration Revocation )  
Procedures )

CC Docket No. 93-268

RM 7815

RM 6147

COMMENTS OF AMERITECH

Ameritech<sup>1</sup> submits these comments in response to the Commission's Notice of Proposed Rulemaking in the above proceeding.<sup>2</sup> By the NPRM, the Commission is seeking to modify Part 68 of its rules in four respects. First, the Commission proposes modifications to include, in the scope of Part 68, terminal equipment connected to the two-wire Basic Rate Access ("BRA") and the four-wire Primary Rate

<sup>1</sup> Ameritech means: Illinois Bell Telephone Company, Indiana Bell Telephone Company, Incorporated, Michigan Bell Telephone Company, The Ohio Bell Telephone Company, and Wisconsin Bell, Inc.

<sup>2</sup> In the Matter of Petition to Amend Part 68 of the Commission's Rules, CC Docket No. 93-268, RM 7815, RM 6147, Notice of Proposed Rulemaking, FCC 93-484 (released November 22, 1993) ("NPRM")

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Access ("PRA") interface provided by the Integrated Services Digital Network ("ISDN") access technology. Second, the Commission also proposes to include, terminal equipment that connects to Public Switched Digital Service ("PSDS") within the scope of Part 68. Third, the Commission proposes to incorporate authorization revocation procedures into Part 68. Fourth, the Commission proposes several miscellaneous corrections to existing Part 68 language.

Ameritech agrees with the Commission's proposal to include both BRA and PRA ISDN equipment within the embrace of the Commission's Part 68 registration program. Standards have been set. The services are being deployed. It is an appropriate time to expand the scope of Part 68 to cover these services. However, despite IDCMA's somewhat optimistic view of the effect of adopting Part 68 rules for ISDN, the proposed changes to Part 68 only relate to layer 1 (the physical layer) ISDN protocols, eliminating only one area of potential variability in the industry. Even though the industry has agreed to standards that encompass higher level protocols, a perhaps greater impediment to the interoperability of ISDN switching equipment and terminal equipment is the treatment by equipment manufacturers of "options" within the existing standards framework. This differing treatment often results in one manufacturer's CPE being incapable of being fully utilized on another manufacturer's switch. At this point, while it is not a Part 68 "network harms" problem, the situation does create customer confusion at times. Thus, in this case, the incorporation of ISDN equipment into Part 68 will not solve all the "problems" with ISDN deployment, nor should it. Rather, the market will, over time, sort these things out.

With respect to the types of plug-jack connectors that are to be used for ISDN services, Ameritech agrees with the recommendations filed by the Exchange Carrier Standards Association's (now the Alliance for Telecommunication Industry Solutions ("ATIS")) T1 Committee. Ameritech would note that the Commission need not

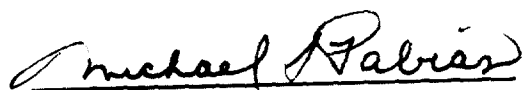
specify any particular means of connection for ISDN services. Rather, Section 68.104 of the Commission's rules currently provides that telephone company jacks shall either conform to subpart F of Part 68 or be described in the telephone company's tariffs. As noted in its comments in response to Southwestern Bell's petition, Ameritech utilizes the standard six-point RJ11C jack for connecting single-line, two-wire ISDN BRA. Ameritech utilizes the tip and ring leads specified for the RJ11C to provide the tip and ring leads for ISDN BRA. Since the RJ11C accommodates up to six "pin" positions, there will remain additional positions to be associated with the unspecified options included in the ANSI ISDN standard. Ameritech has no plans to utilize either the battery or the power positions so there is no need for it to use an eight-position jack to provide the service. Although the ANSI standard for BRA proposes an eight-position non-keyed receptacle, connection to a standard RJ11C jack could be achieved through a simple, inexpensive six-position to eight-position double-male adapter.

Further, for the reasons articulated in its petition, Ameritech also supports the Commission's decision to include PSDS terminal equipment in the Part 68 program. However, Ameritech proposes two minor wording changes. In the proposed additions to Section 68.308, the following changes should be made. In subparagraph (b)(1)(viii), the words "when averaged" should be inserted after "-12dBm". In subparagraph (b)(2)(iii), "a" should be replaced by "any" before "3-second". These changes will make the text consistent with the text already in the respective paragraphs of Section 68.308.

In addition, Ameritech supports the Commission's efforts to strengthen Part 68 by implementing an authorization revocation mechanism. The provisions will facilitate the revocation of Part 68 authorizations where they were fraudulently obtained or where continued use of the equipment causes harm to the telephone network.

Finally, Ameritech supports the Commission's additional proposals to correct and clarify various provisions of the Commission's Part 68 rules.

Respectfully submitted,

A handwritten signature in cursive script, reading "Michael S. Pabian", written in dark ink.

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